

EU Seafood Supply Synopsis (former Finfish Study)

The importance of international trade for seafood security in the EU



This study has been conducted to demonstrate the need for supply of imported seafood to produce added value seafood within Europe. The availability of a continuous, sustainable supply of raw materials is a key factor for maintaining and allowing expansion of employment and trade opportunities generated by the fish and seafood processing industry in Europe.

AIPCE-CEP

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In memory of Simon Rilatt and his years-long valuable engagement in this Study.

This report is publicly available via the AIPCE-CEP website on $\underline{\text{https://www.aipce-cep.org/aipce-cep/white-fin-fish-study/}}$

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Foreword

The AIPCE CEP EU Seafood Supply Synopsis¹ is prepared by and for the seafood processing and trade industry in Europe. For over 30 years, it has served as a valuable tool in illustrating the activities of the fish and seafood processing and trading sectors. It articulates AIPCE-CEP's perspective on key issues impacting trade and underlines the importance of finding pragmatic and viable solutions to sustain these activities within the bounds of fair competition.

The biggest challenge for EU traders and processors remains the sourcing of raw materials, a task made more difficult by political instability in key regions. Despite these challenges and a complex market, the EU seafood value chains have demonstrated resilience in 2023. Per capita seafood consumption in the EU appears to have remained stable or decreased slightly in some Member States.

Nevertheless, the EU fish processing and trading industry faces increasing competitive pressures in international markets; the growing difficulty in securing suitable labour, standards and regulations that vary widely among third countries and new trade and cooperation agreements that present additional complexities.

These challenges underscore the importance in staying attuned to international developments, anticipating changes, maintaining strong relationships with EU institutions and national administrations and fostering collaboration within the framework of EU competition law.

Tools like the ATQ system remain essential for maintaining market stability and industry growth, especially during periods of market volatility.

It is crucial that industry players independently work towards ensuring the Union's food sovereignty by responsibly supplying the market with healthy, safe and affordable products. Seafood consumption is essential for both consumer health and environmental sustainability; it complements a more plant-based diet and provides important and necessary nutritional benefits to consumers.

Guus Pastoor

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¹ We acknowledge that other publications and databases offer more detailed insights into individual species and categories or provide closer coverage of daily industry events. However, this study offers a comprehensive overview of trade flows relevant to the EU processing industry and wholesale sector.

The study has been known as Finfish Study prior to this edition.

1 Introduction

1.1 Aim of the Finfish Study

The European fish and seafood added-value processing industry relies on a consistent and sustainable supply of raw materials to satisfy consumer demand for fish products, both in domestic and out-of-home markets. While traditional species dominate consumption in most Member States, there has been a considerable expansion in the variety of species and presentation forms in recent years, as logistics and access to materials have improved. Consumers are increasingly aware of the broad spectrum of species and presentation forms available globally, aided by greater access to information and travel experiences.

As in other sectors, external sources have been the lifeblood of the industry for many years and fulfil an essential role. Relying solely on EU domestic supply would result in a much smaller industry and limit the scope for both growth and innovation. The utilisation of various species and the complementing of domestic and external supplies have allowed the sector to maintain and increase its relevance across all member states.

This study—prepared by AIPCE-CEP and its members—exemplifies the need for externally sourced raw seafood materials to produce added-value seafood within Europe. The ability to rely on a continuous, sustainable supply of raw materials is crucial for maintaining and expanding employment and trade opportunities generated by the fish and seafood processing industry in Europe.

The data in this study focuses solely on the volume aspect of trade, not its value. This is because AIPCE-CEP's interest lies in the scale of EU activity relative to the availability of resources both within the EU and beyond. AIPCE-CEP recognizes that price and relative values are an important dynamic of the trade; however, across the 27 EU Member States, there are many variations in formats, products, and specifications that distort prices, making direct comparisons challenging.

Competition for fish and seafood has increased on the global stage. The sector represents one of the largest in

Who is AIPCE-CEP

AIPCE (EU Fish Processors and Traders Association) and CEP (European Federation of National Organizations of Importers and Exporters of Fish) were established in 1959 and collaborate the basis of a cooperation agreement, creating AIPCE-CEP. AIPCE-CEP comprises 13 EU National Associations and 2 associations from third countries. The sectors AIPCE-CEP represent account for more than 3,350 enterprises and 102,000 jobs.



34 Billion turnover³



3,350 enterprises¹



102,000 direct employees1



8.6 million tonnes/year EU import2



2.1 million tonnes/year EU export²

¹ Source: AER fish processing 2023, edited by AIPCE CEP *Source: Eurostat [EU27], year 2023 edited by AIPCE-CEP (WFE)

The value of the output of the industry represented amounts to around EUR 34 billion, about 5 times the turnover of the EU catching sector.

international food trade and certainly surpasses other proteins. The need to conduct this trade responsibly has never been greater, and within AIPCE-CEP, we have been engaged in several initiatives to ensure our role in this is properly fulfilled and understood.

AIPCE-CEP represents the EU fish processors and traders as a common strong voice in Europe providing for a framework in which companies can grow and prosper to continue offering healthy, sustainable and responsibly sourced fish products. AIPCE-CEP works to inform, analyse and monitor the trade in EU fish and seafood providing feedback and pragmatic advice to regulators and other stakeholders. This is not just to ensure compliance with existing regulation but also to create more effective and appropriate future legislation that enhances the reputation of the industry whilst still allowing it to operate.

AIPCE-CEP strives to take an active role in helping shape regulatory matters to best achieve their aims but within a pragmatic framework that ensures proper implementation and effect. AIPCE-CEP is pro-active in leading the dialogue and where appropriate over many years has taken actions within the supply chains ahead of regulatory controls to meet the expectations of stakeholders and consumers. At the same time, AIPCE-CEP is always mindful that this needs to be done whilst achieving and maintaining a consistent, regular and competitive offering.

The world of seafood is extremely dynamic and AIPCE-CEP is constantly responding to this. The provision of safe, nutritious and affordable food has been the activity of AIPCE-CEP members since its inception. Accepting the responsibilities this imposes on AIPCE-CEP to play its role in managing resources and their proper use has been at the forefront of its activities and AIPCE-CEP is acutely aware of the many considerations that comes with this for others and our members. AIPCE-CEP is confident that the efforts going into precautionary management, resource allocation and sustainability are paying off in many parts of the world.

1.2 Used data

The report is primarily based on statistics from Eurostat 2023 data and refers to the EU 27. Any other data is attributed to its respective source.

Eurostat provides information by fishery product, species, and/or category. To ensure consistency and facilitate meaningful comparisons, all information in the study has been converted to Whole Fish Equivalent (WFE).

Prior to 2009, the study used the official conversion factors of the German government as the basis for these calculations. While using such official data ensures consistency, AIPCE-CEP believes it inadequately accounts for some increasingly significant differences in regional processing and product formats that, in certain instances, have become key influencers in both EU and global markets.

AIPCE-CEP's methodology adopts its own set of conversion factors, based on expressed processing yields derived from the practical experience of AIPCE-CEP members. AIPCE-CEP believes this approach more accurately reflects the differences between the major processing methodologies currently employed, resulting from both technical innovation and regional shifts around the world. Importantly, this allows us to assess more realistically how much of the global resources are utilised in the EU market.

The EU Market Observatory for Fisheries and Aquaculture Products (EUMOFA) regularly publishes trade data and has established conversion factors for all CN codes through its own research. In most cases, these align closely with those used by AIPCE-CEP, which has helped improve the accuracy of official reporting.

There will always be gaps and anomalies in the official statistics when they are first published, and there is an established process for correcting these retrospectively. Consequently, historical numbers may be adjusted in the Finfish study as later versions become available, although these changes are typically minor.

2 Consumption and supply

2.1 Key findings

- The total market supply (EU production + imports from third countries) for the EU amounted to 12,473 thousand tonnes in 2023.
- EU domestic supply for consumption reached 3,907 thousand tonnes in 2023.
- A total of 8,566 thousand tonnes of seafood for consumption was imported from third countries in 2023.
- Exports to third countries amounted to 2,137 thousand tonnes in 2023.
- Total EU consumption (EU domestic supply + imports exports) in 2023 was 10,336 thousand tonnes.
- Per capita consumption in 2023 was 23.0 kg.

The minimum EU import dependence rate for 2023 was approximately 62% of total supply.

2.2 Food balance

The EU market is heavily reliant on imported materials to meet consumer demand. EU domestic supply alone cannot satisfy this demand, either in terms of volume or species diversity. Table 2.1 illustrates the EU food balance for fish and fishery products.

2.2.1 EU domestic supply

EU domestic supply comprises EU catches and aquaculture production. In 2023, 72% of this supply originated from EU catches (2,812 thousand tonnes), while aquaculture production contributed 1,095 thousand tonnes. A portion of the EU catches, amounting to 646 thousand tonnes, is designated for non-food uses such as fishmeal and fish oil. This brings the total EU domestic supply for food purposes to 3,907 thousand tonnes in 2023, a figure comparable to that of 2022.

2.2.2 Imports from third countries

Imports from third countries are crucial for boosting both the volume and diversity of fish available in the EU. In 2023, import activity remained significant, with 8,566 thousand tonnes of fish imported—double the volume of the EU's domestic supply. However, this import volume represents a 3 percent decrease compared to 2022, when 8,857 thousand tonnes were imported.

2.2.3 Total supply

The total supply of fish products for consumption in the EU is derived from the combined food-use resources of domestic supply and imports from third countries. In 2023, this total supply reached 12,473 thousand tonnes.



2.2.4 Export to third countries

Export activity reached 2,137 thousand tonnes in 2023, reflecting a 5% decrease compared to 2022, when exports totalled 2,243 thousand tonnes. Exports account for approximately 55% of the total EU domestic food supply.

2.2.5 Total consumption

The combined effect of domestic supply, imports, and exports resulted in a calculated total consumption of 10,366 thousand tonnes in 2023. This figure is comparable to previous years, reflecting the EU situation excluding the

UK, with a slight decrease of 2% (-198 thousand tonnes in 2022). It should be noted, however, that consumption may be slightly overestimated due to Alaska Pollock imports stored at the end of 2023 (see Chapter 5.2.5).



The success of the industry continues to depend heavily on access to imported fish, as domestic supply alone cannot meet full consumption demand, particularly given the recent decline in EU production. Ensuring that trade flows remain as seamless and efficient as possible is crucial, given the EU processing industry's reliance on a truly global sourcing base.

2.2.6 Total consumption per capita

On a per capita basis, the total available supply amounts to 27.8 kg (or 27.6 kg after adjusting for Alaska Pollock; see Chapter 2.5.2), which falls within the 10-year range of 28.0 kg \pm 1.0 kg. After accounting for export activity, per capita consumption decreased from 23.6 kg in 2022 to 23.0 kg in 2023 (or 22.9 kg after adjusting for Alaska Pollock; see Chapter 2.5.2).

2.2.7 Self-sufficiency

The Finfish study aims to underscore the scale of the industry and its reliance on imports. As noted earlier, the total EU supply for food-use products in 2023 was 12,473 thousand tonnes. After accounting for exports, the potential net consumption is 10,336 thousand tonnes. When projected in terms of reliance and self-sufficiency, this data reveals the following:

- If all EU catches and aquaculture fish were retained within the EU, they would account for 36.5% of the total available supply. However, this figure includes non-food use and is therefore not a realistic measure.
- When adjusted for food use only, the EU domestic supply represents 31.3% of the total available supply, assuming all production remains within the EU.
- Further adjustments must be made to account for exports, which are a significant component of fish trade. After this consideration, EU domestic supply covers only 14.2% of total consumption.

Conversely, these figures indicate that imports constitute 68.7% of the total available supply and 82.9% of total consumption.

The EU's dependence on imported materials for its markets has remained exceptionally high, particularly following the UK's exit from the EU. In 2023, this dependence decreased to 62.2%, largely due to stable EU production and a decline in imports from third countries.

2023 EU import dependance

62.2%

The EU import dependence is calculated using a purely theoretical approach, based on the most optimistic scenario. This calculation assumes that all exports are retained within the EU and offset by an equivalent volume of imports (2,137 thousand tonnes) on a one-to-one basis. Under this assumption, the level of import dependence rises to 82.9% if all exports are considered to be EU-produced seafood.

Table 2.1: Food balance for fish and fishery products

1,000 tonnes live weight

	EU (28)					EU (27)					
	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023*	2024**
Catches	5.494	5.260	5.127	5.425	5.337	4.922	3.869	a) 3.591	a) 3.487	b) 3.457	c) 3.492
+ Aquaculture production d)	1.236	1.268	1.296	1.370	1.319	1.367	1.088	1.129	1.084	1.095	1.139
- Non-food uses	960	1.056	858	1.227	1.347	1.331	906	671	651	646	652
= Supply for consumption	5.770	5.472	5.565	5.568	5.309	4.958	4.051	4.049	3.920	3.907	3.979
+ Imports (Third countries) e)	9.124	8.990	9.246	9.306	9.439	9.469	8.913	8.968	8.857	8.566	8.395
= Total supply	14.894	14.462	14.811	14.874	14.748	14.427	12.964	13.017	12.777	12.473	12.373
- Exports (Third countries) e)	2.293	2.012	1.977	2.121	2.233	2.233	2.494	2.338	2.243	2.137	2.051
= Total consumption	12.601	12.450	12.834	12.753	12.515	12.194	10.470	10.679	10.534	10.336	10.322
Total supply per capita (kg) f)	29,4	28,4	29,0	29,1	28,8	28,1	29,0	29,2	28,6	27,8	0,0
by EU catches in %	30	29	29	28	27	25	23	22	22	23	23
by EU aquaculture in %	8	9	9	9	9	9	8	9	8	9	9
by third countries imports in %	61	62	62	63	64	66	69	69	69	69	68
Consumption per capita (kg) g)	24,9	24,5	25,2	24,9	24,4	23,8	23,4	23,9	23,6	23,0	0,0
Self-sufficiency (%) h)	46	44	43	44	42	41	38,7	37,9	37,2	37,8	38,5

Notes: a) Corrected figures.- b) Preliminary figures.- c) Forecast.- d) Estimation for 2022-2024.- e) Without fishmeal (feed) and fishoil, product weight converted into live weight.-

Source: Eurostat, Eurostat-Comext, EU catch report, EUMOFA, FEAP, AIPCE-CEP-Estimations and forecasts Published by: AIPCE 2024

f) Total supply / EU-population * 1000 = kg/caput/year.- g) Supply for consumption / EU-population * 1000 = kg/caput/year.-

h) Supply for consumption / Total consumption * 100 = Rate of self-sufficiency in %.-

2.2.8 Current trends

In AIPCE-CEP, we continue to observe a growing diversity in species, frequency and consumption patterns as innovations in packaging, logistics and access create new opportunities for consumers to enjoy fish more frequently and in varied forms.

In 2023, inflation across the EU impacted seafood sales. Consumers shifted from more expensive species to lower-cost alternatives, such as cheaper fish, meat or poultry. Consequently, high-priced seafood stored in cold facilities was often sold below cost price or with minimal margins to remain competitive. This led to a decline in financial performance for many companies within the EU seafood sector in 2023.

Towards the end of 2023, traders and industry players sourced increased volumes of seafood from Russia, benefiting from preferential tariffs under the ATQ regulation. However, from 2024, Russia was excluded from these tariff advantages.

Additionally, since 2023, medium- and high-risk seafood products destined for the UK must be accompanied by a health certificate. Although trade flows have stabilized, trading with the UK now presents challenges similar to exporting to other third countries.

To ensure continued access to market opportunities, it is essential that the industry is not hindered by unnecessary tariff or non-tariff barriers. Maintaining access to raw materials through the ATQ system, without duties, is crucial. Imposing duties increases costs for consumers, potentially leading to reduced sales and putting pressure on EU-based production. This could result in production moving outside the EU.

3 Regulatory review

3.1 Autonomous Tariff Quotas (ATQs)

A recurring message from the Finfish Study has been the industry's reliance on external sources, and the Autonomous Tariff Quotas (ATQs) are specifically designed to provide the EU industry with access to raw materials in a way that stimulates growth, employment, and investment. EU Free Trade Agreements do not cover sourcing from all key third countries, and ATQs allow for seamless switching between these countries without forfeiting preferential tariff rates.

The current ATQ regime, outlined in Council Regulation (EU) 2023/2720 for the 2024-2026 period, excludes Russia and Belarus for the first time, notably affecting the sourcing of Alaska pollock. This exclusion necessitates submitting documentation to prove non-Russian origin when applying for end-use. However, Article 60 of Regulation 2023/2720, which covers non-preferential rules for origin, allows room for different interpretations by member states, leading to legal uncertainty for individual importers. The EU fish industry strongly advocates for clear, consistent, and operational criteria.

In this ATQ round, new qualifying operations were introduced, such as pasteurization for roe products, cleaning for defined products and species, modified atmosphere packaging for crayfish tails, and splitting of interleaved blocks of cephalopods. Additionally, new species were added, including *Eopsetta Jordani*, *Patagonian grenadier*, and tilapia. Meanwhile, herring and herring products were excluded from ATQs, with no compensatory measures yet established to 'bridge' herring supplies until the EEA quotas under the Additional Protocol come into effect. Quotas for *Pleoticus Muelleri* were doubled to 16,000 tons, and those for *Pandalus Jordani* increased to 4,000 tons, while the cod fillet quota was reduced to 45,000 tons. Quotas for tuna loins and *Pleoticus Muelleri* were exhausted in 2024, but other quota amounts appear non-critical for the remainder of the year.

The European Commission is preparing to introduce sustainability criteria for future ATQs, with a public consultation expected in early 2025. The EU fish industry is calling for transparent, precise and auditable criteria to ensure clarity and compliance.

3.2 Trade agreements

3.2.1 TCA Agreement UK

Following the UK's departure from the EU, bilateral trade has been subject to the terms of a new Trade and Cooperation Agreement (TCA) which took effect in January 2021. This provides for tariff and quota free market access in both directions, subject to Rules of Origin which define qualifying products. Consignments must also meet normal third country sanitary and phytosanitary (SPS) certification and Customs requirements for border control purposes and – where appropriate – comply with existing rules preventing imports products of Illegal, Unregulated and Unreported (IUU) fishing, including storage, catch and processing certificates as necessary.

While UK exports to the EU have been subject to these additional checks since the TCA came into operation at the end of the transition, the UK has repeatedly delayed the introduction of reciprocal checks on imports from the EU. However, the phased introduction of a new UK Border Target Operating Model (BTOM) came into effect as of 31 January 2024, with a second phase starting from 30 April 2024 and a final phase due to begin on 31 October 2024. The BTOM adopts a new risk-based approach which classes products as either high, medium or low risk for inspection purposes. But all imports also need to be pre-notified under the UK's IPAFFS system under which they are subject to separate remote documentary checks. The BTOM also provides for simplified health certification requirements, with the aim of full digitisation prior to the planned introduction of a new Single Trade Window for all border formalities in 2025.

In addition, new arrangements have been drawn up for trade between Great Britain and Northern Ireland under the Windsor Framework, which modifies the provisions of the original Northern Ireland Protocol which was signed in conjunction with the UK-EU Withdrawal Agreement. These are also subject to phased introduction which started in October 2023 and is due to be completed in 2024. This includes the labelling of certain products as 'Not for EU' where they are imported into Northern Ireland for final consumption there, with no risk of onward movement into the EU Single Market.

The UK now also operates a limited national Autonomous Tariff Quota (ATQ) regime, due for review in 2024. In addition, some products benefit from a complete tariff suspension and in both cases the tariff concession is subject to specific end use conditions.

In addition, following Russia's illegal invasion of Ukraine, the UK has introduced deterrent additional tariffs for fishery products of Russian origin.

As noted last year, international supply chains and domestic markets have been impacted by a range of other factors, including higher input, freight and energy costs, consumer price inflation and continuing geo-political uncertainties. It remains difficult to distinguish between these various impacts with respect to current trading patterns.

The TCA itself, including provisions relating to fisheries, is due for review in 2026.

3.2.2 EVFTA Vietnam

The EU-Vietnam Free Trade Agreement (EVFTA) came into effect on 1 August 2020. It is considered the most ambitious trade agreement the EU has ever concluded with a developing country, eliminating 99% of customs tariffs.

While most seafood product tariffs are eliminated immediately under the EVFTA, a significant number will be phased out gradually. During this phase-out period, if EVFTA tariffs for certain seafood products are higher than those under the General Scheme of Preferences (GSP), importers may choose to apply the GSP tariffs instead.

3.2.3 EPA Japan

The Economic Partnership Agreement (EPA) between the EU and Japan came into effect on 1 February 2019. Under this Agreement, all fish products have been, or will gradually be, liberalised over time.

3.2.4 FTA EU New Zealand

The EU-New Zealand Free Trade Agreement came into effect on 1 May 2024, introducing zero-duty imports for most fish and fishery products, with phased reductions for others. This agreement will facilitate the import of hoki, both fillets and whole fish, into the EU market and industry.

3.2.5 Other trade agreements

In addition to the TCA agreement with the UK, the EVFTA agreement with Vietnam, and the EPA agreement with Japan, several other EU trade agreements are currently under negotiation. However, these agreements have been concluded less frequently and their relevance to the EU processing industry varies, as fish resources continuously shift and change.

Finalizing these trade agreements will strengthen bilateral relations, boost trade, and remove unnecessary barriers between the EU and its partner countries.

3.3 EEA Agreement: Revising quotas within the Financial Mechanism EU – Norway/Iceland for 2021-2028

The revision of the two additional protocols to the EU agreements with Norway and Iceland for 2021–2028 has been significantly delayed. Negotiators reached an agreement on 30 November 2023, and the EU Council approved a provisional application on 25 June 2024, though the exact opening date remains unknown. In addition to the 44 permanent quotas within the EEA agreement, 20 yearly quotas will be made available, including 28,000 tons of spiced and/or vinegar-cured herring in brine and 2,500 tons of smoked salmon. Upon opening, the quota volumes will be substantially higher as the 'unused' volumes from 1 May 2021 until the provisional application will be proportionally allocated for the remainder of the period until 2028. From 2021 to 2023, 'bridging' ATQs were set up for spiced and frozen herring; however, the current 20% duty on spiced herring in brine is unsustainable for the EU industry. AIPCE-CEP has requested a transition solution in the form of interim ATQs from 1 January 2024 to the date of the new EEA quotas' application. Alternatively, retroactive reimbursement of paid duties could have provided a viable solution. The yearly smoked salmon quota of 2,500 tons, expected to effectively reach 4,500 tons or more, will exacerbate market distortion caused by Norway's ban on production salmon exports, as detailed in section 5.3.1.

3.4 IUU and CATCH

With respect to the IUU (Illegal, Unreported, and Unregulated) Fishing Regulation, the European Commission continues to implement the "yellow and red card" system to combat and eliminate illegal fishing activities. Processors and traders take their responsibilities seriously in ensuring that IUU fish products do not enter the supply chain.

As of June 2024, five third countries have been issued a "red card," preventing imports of seafood products into the EU from these countries:

- Cambodia (since November 2013)
- St. Vincent and the Grenadines (since May 2017)
- Comoros (since May 2017)
- Cameroon (since January 2023)
- Trinidad and Tobago (since September 2023)

Countries currently holding a "yellow card" since 2020 include:

- Cameroon (February 2021)
- Ghana (June 2021)
- Senegal (May 2024)

Meanwhile, Kiribati had its "yellow card" removed in December 2020, which had been in place since April 2016. Currently, eight countries hold a yellow card: Ecuador, Ghana, Liberia, Panama, Sierra Leone, St. Kitts and Nevis, Senegal, and Vietnam.

In May 2019, the European Commission launched CATCH, an IT system designed to digitalise the existing paper-based EU catch certification scheme as stipulated in Regulation (EC) No 1005/2008. The latest version of the IUU Regulation stipulates that the use of CATCH will become mandatory for EU operators and authorities for fishery product imports as of 10 January 2026.

4 Russian war on Ukraine

Due to Russia's aggression against Ukraine on February 24, 2022, the EU imposed an import ban on October 6, 2022, covering Russian caviar and caviar substitutes (CN 16043100 and 16043200), as well as crustaceans under CN Chapter 0306—measures that remain in effect. Following Council Regulation (EU) 2023/2720 for the 2024-2026 period, autonomous tariff quotas (ATQs) were no longer available for products originating from Russia or

Belarus. However, imports at MFN tariff rates remain possible for Alaska pollock, cod, and other fish and fishery products from Russia, and Russian products continue to be included under GATT-bound *erga omnes* quotas.

The EU fish processing industry remains heavily dependent on Russian raw materials, with an estimated 34% of the total whitefish supply in 2023 being of Russian origin. A substantial portion of Alaska pollock, a key species, is reprocessed in China before being dispatched to the EU, and there are currently no viable substitutes for this species among other whitefish.

A complete ban on Russian seafood would therefore have severe negative consequences for both the EU and global food supply, as well as for the EU fish processing industry. Any illegal fishing by Russian vessels should be addressed with firm countermeasures within the EU legal framework to combat IUU activities. Sanctioning instruments should be applied to prevent illegal products from entering the EU market.

5 Product category

5.1 General

Since 1992, the Finfish study focused on the dialogue and explanation of trade in the seven key wild whitefish species (cod, Alaska pollock, hake, haddock, saithe, redfish & hoki). This category will be analysed in the first subcategory of this chapter. However, during time more and more species were introduced in the Finfish study (e.g. plaice, salmon, shrimp, tuna, et cetera). These species are analysed, divided and presented in subsequent subcategories.

EU supply will be based on EU-imports, aquaculture production and fisheries catches, where:

- EU-imports are based on Eurostat/Comext data;
- Aquaculture production data comes from the Federation of European Aquaculture Production (FEAP) and estimations from AIPCE-CEP;
- Fisheries catches consist of catches of EU-quoted fish species (EU Catch Report).

Fish volumes are converted to Whole Fish Equivalents (WFE).

5.2 Whitefish

5.2.1 General

The apparent demand of whitefish of EU-27 is high with 2,473 thousand tonnes for wild capture species in 2023 (-1%; -33 thousand tonnes). These species represent cod, Alaska pollock, hake, haddock, saithe, redfish & hoki. Increased global competition on procurement and a drop in some of the important whitefish quotas put pressure on the whitefish supply in future.

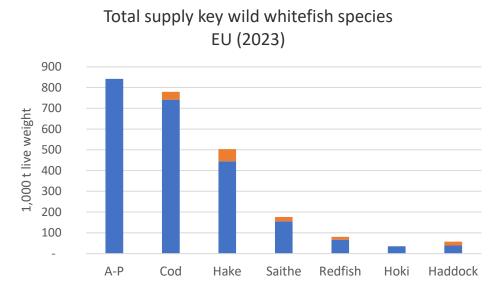


Figure 5.1: Total volumes utilized in the EU of key wild captured whitefish species in 2023; Source: Eurostat/Comext

Whitefish species are of great importance in the supply of the EU market, due to the scale of the tonnages involved, and also the high added value provided by the processing of these species by the EU processing industry. Most of the whitefish is imported from outside the EU borders, around 94% in 2023 (2,323 thousand tonnes). Alaska Pollock and Cod are the most important whitefish species in the EU supply, accounting to 842 thousand tonnes and 779 thousand tonnes in 2023 respectively. Species like Alaska pollock and hoki are fully dependent on imports from outside the EU (figure 5.2).

Import dependency key wild whitefish species EU (2023)

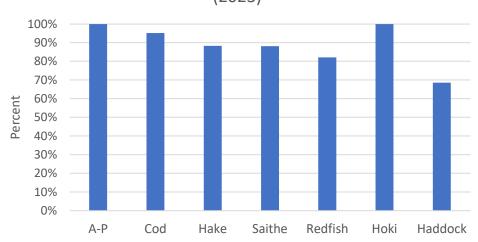


Figure 5.2: Import dependency EU for key wild captured whitefish species in 2023; Source: Eurostat/Comext

Supply from EU catches of species under quota management show a decreasing trend for many years. The total landings volume of whitefish decreased by 43% between 2020 (beginning of EU27) and 2023. Compared to 2022 the total landing volume of whitefish amounted to 150 thousand tonnes, a decrease of 15% compared to 2022 (-26 thousand tonnes). Especially cod (-13 thousand tonnes; -26%), hake (-5 thousand tonnes; -9%) and redfish (-9 thousand tonnes; -38%) were caught in lower quantities.

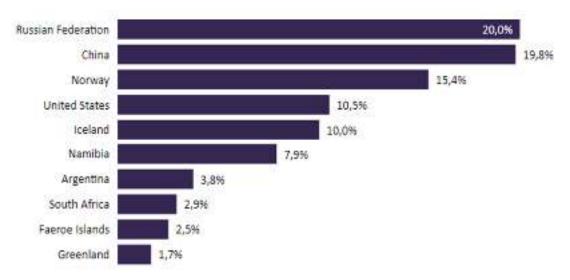


Figure 5.3: External sourcing countries for key wild captured whitefish species in 2023 in percentage of total import (2,323 thousand tonnes); Source: Eurostat/Comext

The most important external sourcing countries in 2023 were Russia (464 thousand tonnes; +2%), China (459 thousand tonnes; +11%), Norway (359 thousand tonnes; -2%), USA (244 thousand tonnes; -11%) and Iceland (232 thousand tonnes; -14%) (figure 5.3). USA share of EU imports of whitefish has dropped to 10.5% due to a reduced import of Alaska Pollock from this country in 2022 (-110 thousand tonnes) and 2023 (-33 thousand tonnes). Almost all whitefish import from China and USA are frozen fillets (especially Alaska Pollock). The sourcing from China would also cover fish from other origin and reprocessed and dispatched from China to EU.

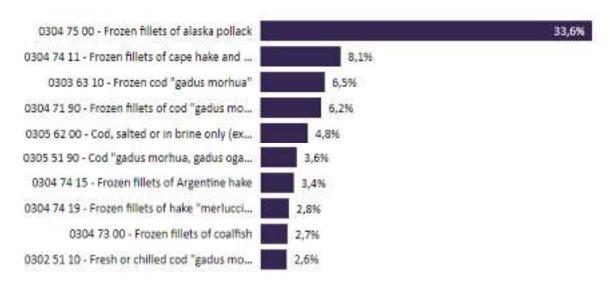


Figure 5.4: Main imported products of wild captured whitefish species in 2023 in percentage of total import (2,323 thousand tonnes); Source: Eurostat/Comext

From all imported wild captured whitefish species in 2022, 33.6% (780 thousand tonnes) consisted of frozen Alaska Pollock fillets coming from China (43.4%; 338 thousand tonnes), Russia (33.0%; 257 thousand tonnes) and USA (21.0%; 164 thousand tonnes) (figure 5.4). 8.1% (189 thousand tonnes) of the total whitefish imports were frozen cape hake fillets from Namibia (73.6%; 139 thousand tonnes) and South Africa (26.3%; 50 thousand tonnes). Whole frozen cod was with 6.5% the third most important imported whitefish product imported from Russia (54.6%; 83 thousand tonnes), Norway (23.4%; 35 thousand tonnes) and Greenland (18.6%; 28 thousand tonnes).

"Whitefish species are of great importance in the supply of the EU market, due to the scale of the tonnages involved, and also the high level of added value provided by the processing of these species by the EU processing industry"

Whitefish species are well established in the EU and consumers are familiar with them. Continued access to global whitefish fisheries without unnecessary barriers is essential if processing industry is to be viable and in turn maintaining that viability is key to be able to offer long term opportunity to the EU catching sector.

Edited by AIPCT-CEP 2024

Cod Import dependance EU-supply Of which imported: 2023 Whole, frozen: 779k tonnes (WFE) 169k tonnes (WFE) よ Fillet, frozen: 168k tonnes (WFE) 4 2020 -2023 Trend Salted or in brine only: 268k tonnes (WFE) 95% Country of origin 741k tonnes (WFE) Norway 22% celand Russia 21% Source, Eurostot/Comext, EU Catch Report

Most of the landed Atlantic cod worldwide comes from the Barents Sea. Fishing quotas in the Barents Sea decreased to 566,784 tonnes in 2023 (-20%), which is important for the EU cod supply. For 2024 and 2025 cuts are expected of -20% (453,427 tonnes) and 31% (311,587 tonnes) respectively. The decreasing quota volumes will have a huge impact on price and availability of the specie for the EU market. Barents Sea quota is divided between Norway and Russia according to roughly an equal share, with each country receiving around 50% of the TAC. Portions of the quota may also be allocated to third countries under international agreements

The mid-Atlantic region around Iceland is another important source for Atlantic cod. Cod quota in this area was decreased by 6% in 2023-2024 to 208.846 tonnes. For 2024-2025 cod quota slightly increased to 213,214 tonnes (+2%).

Pacific cod are mainly caught by USA/Canada, Russia, Japan and Korea. Gulf of Alaska cod & Bering Sea Aleutian Island cod quota slightly decreased to 131 thousand tonnes in 2023, -16% lower than the Pacific cod TAC in 2022. For 2024 the quota slightly decreased to 130 thousand tonnes (-1%).

In 2023 the total EU-27 cod supply decreased by 8 percent to 779 thousand tonnes (-69 thousand tonnes). EU cod fisheries represented 5% of this supply, 38 thousand tonnes (-13 thousand tonnes). The other 741 thousand tonnes of cod products were imported from third countries, especially from Norway (33%), Iceland (22%) and Russia (21%). Where the biggest share (59%) of cod from Norway consists of salted/dried cod (143 thousand tonnes), Icelandic Cod is mainly imported in fresh (27%; 44 thousand tonnes) or in frozen fillets/blocks (24%; 40 thousand tonnes), and Russian cod mainly frozen raw, simply headed and gutted (53%; 83 thousand tonnes).

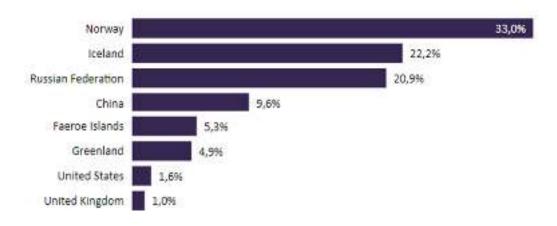


Figure 5.2.2.1: External sourcing countries for key wild captured cod in 2023 in percentage (>1%) of total import (741 thousand tonnes); Source: Eurostat/Comext

Cod enters the EU mainly via the Netherlands, Denmark and Sweden. Most of the cod imports in 2023 consisted of frozen whole cod (20%), frozen fillets (19%) and salted/brined cod (15%). Cod is re-exported within the EU either processed or not – especially to France, Portugal and Spain. A total overview of imports per HS-code are mentioned in the figure below.

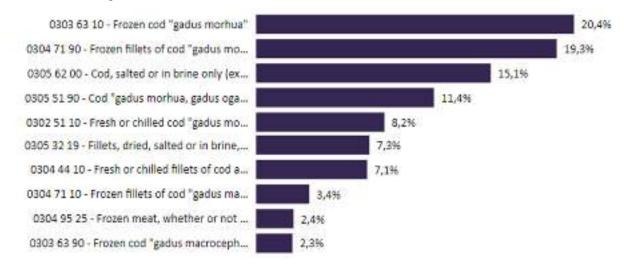


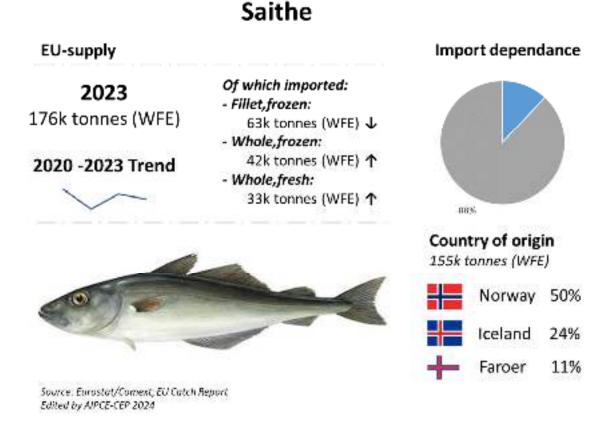
Figure 5.2.2.2: Main imported products of wild captured cod in 2023 in percentage of total import (741 thousand tonnes); Source: Eurostat/Comext

Industry benefits from two significant Autonomous Tariff Quota (ATQ) allowances in cod. These ATQs are the basis for raw materials in the EU fish processing industry. H&G cod (09.2759) has a limit of 110,000 tonnes and cod fillets (09.2776) have a 45,000 tonnes duty free import allowance in 2024. Another ATQ for cod is salted cod for processing (09.2765) with a 2,000 tonnes duty free import allowance in 2024. All quotas are there to stimulate growth, employment, and investment in EU fish processing industry.

Cod raw materials are of high importance for the EU processing industry. Restrictions on ATQs for this product category will have a negative impact on the adding value to it in the EU.

It is obvious that for the future supply of cod in the EU, imports from third countries are vital to secure the high quantity of cod for consumption in Europe. Firstly, EU fishing quotas should be utilized by EU fisheries at their maximum sustainable yield. But reduced fishing quotas for some important cod stocks and the increased complexity in global trade asks for the right measures from the EU Commission to make import as simple as possible.

5.2.3 Saithe



Most of the wild caught saithe comes from the Barents Sea, but also the North East Atlantic region (FAO27) around EU, Iceland, Faroes and Norway is an important area. That's why both EU catches and imports contribute importantly to the saithe supply in the EU. Total Atlantic Saithe supply in 2024 increased to around 382 thousand tonnes (368 thousand tonnes in 2023).

In 2023 the saithe supply decreased to around 176 thousand tonnes (-2% compared to 2022), where 12% of the supply came from EU fisheries (21 thousand tonnes in 2023). The volumes from EU-fisheries stabilized after a huge drop in 2021 (-46%). The other 155 thousand tonnes of saithe are imported from third countries (88% of total supply).

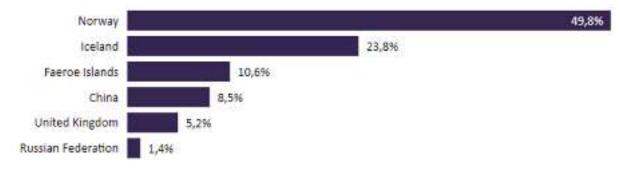


Figure 5.2.3.1: External sourcing countries for key wild captured saithe in 2023 in percentage (>1%) of total import (155 thousand tonnes); Source: Eurostat/Comext

Most important sourcing countries for saithe in 2023 were Norway (50%), Iceland (24%) and Faroes Islands (11%). 41% of the EU saithe imports consisted of frozen fillets, followed by whole frozen saithe (27%) and fresh whole saithe (21%). The products enter the EU mainly via the Netherlands, Denmark, Sweden and Poland, while the main processing and consumption markets are France, Poland, Germany and Denmark.

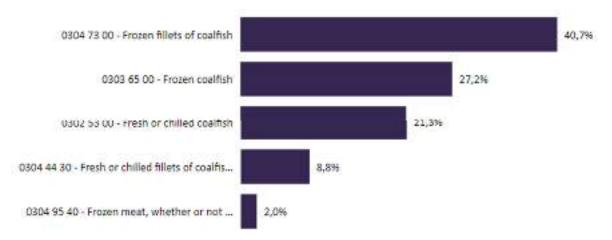
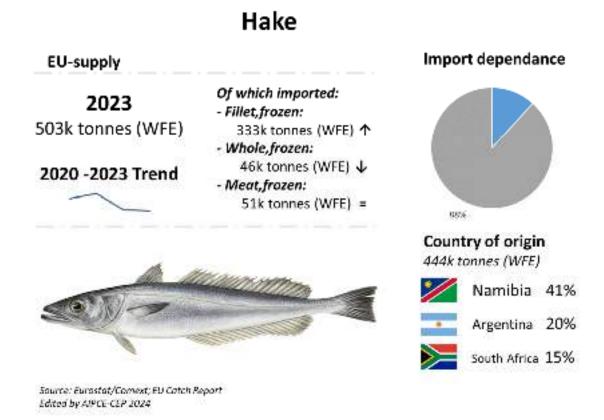


Figure 5.2.3.2: Main imported products of wild captured saithe in 2023 in percentage of total import (155 thousand tonnes); Source: Eurostat/Comext

A small quantity of saithe is exported outside the EU, especially to China (re-export), Brazil and Norway (total of 12 thousand tonnes in 2023).

There are no ATQ allowances in saithe as the saithe supply comes from countries in the EFTA region or the UK.

5.2.4 Hake



EU hake supply slightly decreased to 503 thousand tonnes in 2021 (-1 thousand tonnes; -0%). 88% of this supply is imported from third countries, mainly Namibia (41%), Argentina (20%) and South Africa (15%) for the 444 thousand tonnes of imported hake.

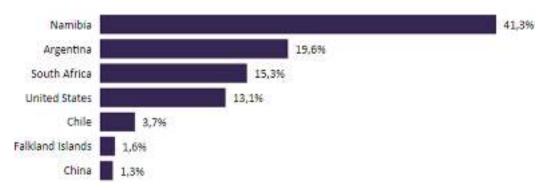


Figure 5.2.4.1: External sourcing countries for key wild captured hake in 2023 in percentage (>1%) of total import (444 thousand tonnes); Source: Eurostat/Comext

EU catches accounted for 59 thousand tonnes in 2023 (-9% compared to 2022), corresponding with an utilisation of 58% of the EU available fishing quota for hake.

Two ATQ allowances are available for hake. Frozen hake for processing (09.2760) has a limit of 10,000 tonnes and frozen fillets and other meat from North Pacific hake and Argentine hake (09.2774) have a 40,000 tonnes duty free import allowance. Both quotas are there to stimulate growth, employment and investment in EU fish processing industry. The base limit for frozen hake fillets and other meat (09.2774) was for 50% used at the first of Juli 2024 (97% used in 2023).

43% of the 2022 hake imports consisted of frozen cape hake or deep water hake fillets, followed by frozen Argentine hake fillets (18%) and Merluccius spp. hake fillets (15%).

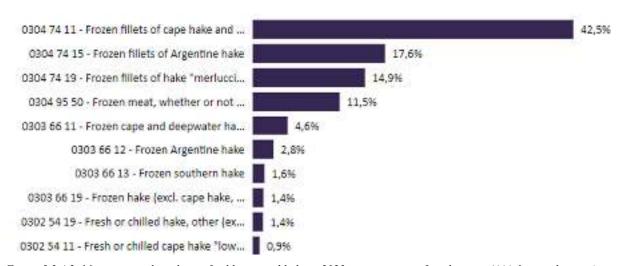
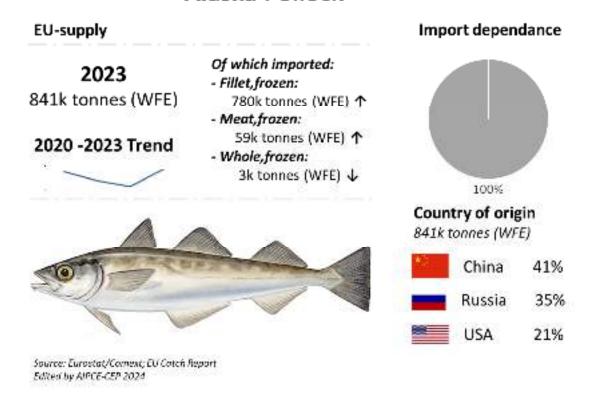


Figure 5.2.4.2: Main imported products of wild captured hake in 2023 in percentage of total import (444 thousand tonnes); Source: Eurostat/Comext

Hake is imported into the EU via Southern European countries mainly, especially via Spain. Spain exports the hake into the EU especially to Italy and Portugal. East European non-EU countries (Ukraine, Moldavia, Serbia and Morocco) are the main destinations for hake exported from the EU, mainly as whole frozen hake.

5.2.5 Alaska Pollock

Alaska Pollock



The total Alaska Pollock fishing quota for 2024 increased to 3,6 million tonnes, of which 2,3 million tonnes were allocated to the Russian Federation and 1,3 million tonnes to the United States.

The EU is fully depending on third country imports of Alaska Pollock, self-sufficiency is 0%. The total supply – and thereby third country imports – accounted to 841 thousand tonnes in 2023, an increase of 5 percent compared to 2022 (+43 thousand tonnes). The increase is mainly due to increased imports from Russia at the end of 2023 (additional import volume in December 2023 of around 70-75 thousand tonnes), to store raw materials under ATQ preferential tariff in the EU. Since 2024 Russia and Belarus are excluded from the ATQ preferential system and import duties should be paid on raw materials from these countries.

The EU represents a significant and key market for both USA and Russian Alaska pollock. The most important sourcing countries for Alaska pollock in 2023 were China (41%), Russia (35%) and USA (21%). Important to know is that over 95% of the Alaska pollock imported from China has a Russian origin. USA import share decreased drastically between 2021 and 2023 (from 39% to 21%) the USA gives priority to sell their Alaska Pollock on their domestic market and Russian imports are banned.



Figure 5.2.5.1: External sourcing countries for key wild captured Alaska pollock in 2023 in percentage (>1%) of total import (842 thousand tonnes); Source: Eurostat/Comext

The industry benefits from a significant Autonomous Tariff Quota (ATQ) allowance in Alaska pollock (09.2777), which is the largest single ATQ assignment. The total ATQ quantity is 340,000 tonnes and was 17% used at the beginning of July 2024 (85% utilisation in 2023).

93% of the Alaska pollock imports in 2023 consisted of frozen fillets, followed by frozen Alaska pollock meat (7%).

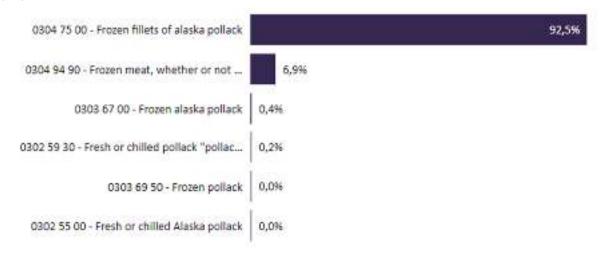
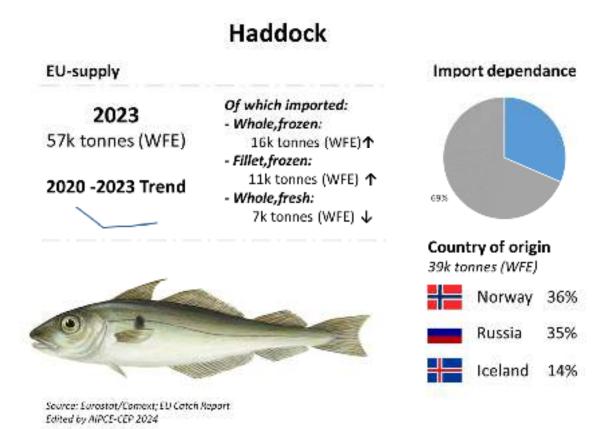


Figure 5.2.5.2: Main imported products of wild captured Alaska pollock in 2023 in percentage of total import (842 thousand tonnes); Source: Eurostat/Comext

Germany (42%) is the main importer of Alaska Pollock, followed by France (17%), Poland (15%) and the Netherlands (12%). Alaska pollock is also an important source of frozen surimi. Import volumes of frozen surimi are not mentioned in this chapter and are studied separately.

Only a small amount of Alaska Pollock is re-exported outside the EU, especially to the surrounding European countries like Switzerland and UK.

5.2.6 Haddock



Most of the EU haddock supply comes from the Barents Sea. In 2024 Barents Sea fishing quota decreased to 128 thousand tonnes for 2025 a 16% decrease is recommended (to 107 thousand tonnes) due to lower stock biomass estimates. For 2026 scientists expect that quotas will increase again.

The EU fleet landed 18 thousand tonnes of haddock in 2023, 43% of the available fishing quota. EU self-sufficiency was 31% in 2023.

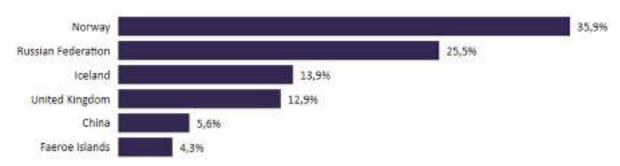


Figure 5.2.6.1: External sourcing countries for key wild captured haddock in 2023 in percentage (>1%) of total import (39 thousand tonnes); Source: Eurostat/Comext

The most important procurement countries for haddock in 2023 were Norway (36%), Russia (26%) and Iceland (14%).

41% of the haddock imports in 2023 consisted of frozen whole haddock, followed by a 28% of frozen haddock fillets and 17% of whole fresh haddock.

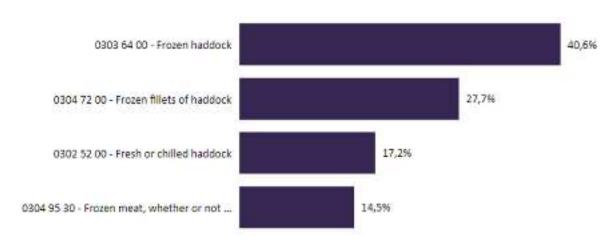


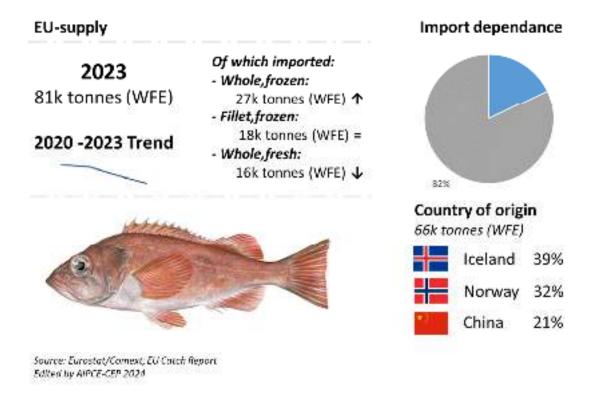
Figure 5.2.6.2: Main imported products of wild captured haddock in 2023 in percentage of total import (39 thousand tonnes); Source: Eurostat/Comext

Most of the haddock is imported via the Netherlands, Poland, Denmark or Ireland.

There is a modest ATQ for haddock available for EU industry: 3,500 tonnes of H&G haddock at 0% duty (09.2824). The ATQ was fully used at the end of 2023. It is questionable if the amount of 3,500 tonnes is high enough for covering the industry demand when growth is factored in.

5.2.7 Redfish

Redfish



In 2023 EU supply of redfish was around 81 thousand tonnes, a decrease of 5% with supply in 2022 (85 thousand tonnes). Around 18% (14 thousand tonnes) of this supply came from the EU fishing fleet (23 thousand tonnes in 2022). The other 82% of redfish (66 thousand tonnes) were imported, mainly from Iceland (39%), Norway (32%) and China (21%).

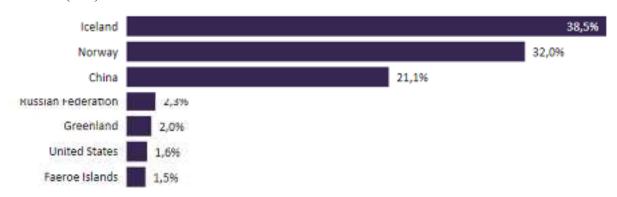


Figure 5.2.6.1: External sourcing countries for key wild captured redfish in 2023 in percentage (>1%) of total import (66 thousand tonnes); Source: Eurostat/Comext

Redfish are imported into the EU via the Netherlands, Denmark, Germany and Spain. Via these countries redfish are processed and/or (re-)exported to other EU-countries, especially Spain, Germany, Portugal and France.

Mainly whole frozen redfish (around 16 thousand tonnes in 2023) from both third country import and domestic production were exported to third countries like Korea, Canada, China and Ukraine.

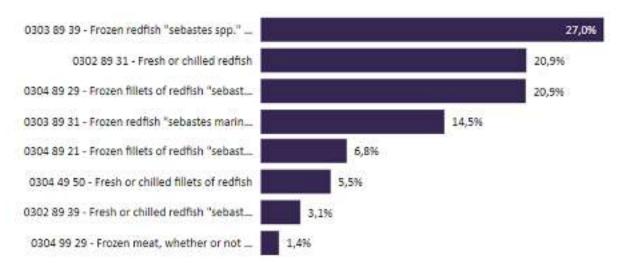
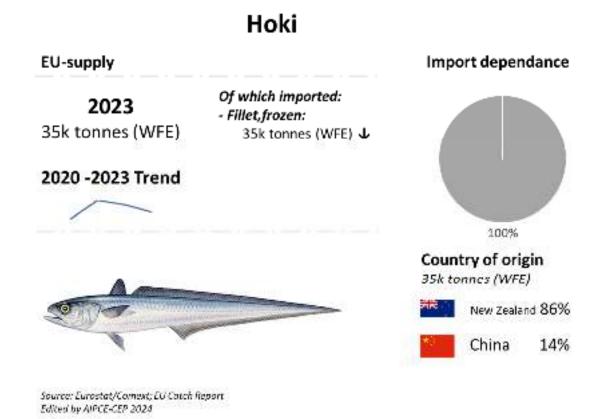


Figure 5.2.6.2: Main imported products of wild captured redfish in 2023 in percentage of total import (66 thousand tonnes); Source: Eurostat/Comext

Frozen whole 'Sebastes marinus' redfish is responsible for 27% of the redfish import, followed by fresh whole redfish (21% of the redfish imports) and frozen fillets of other Sebastes spp. species (21% of the redfish imports).

5.2.8 Hoki



In 2023 hoki EU supply decreased to 35 thousand tonnes, -6 thousand tonnes compared to the year before (-15%). There is no EU catch for hoki so EU is 100% import dependent.

The most important procurement country for hoki is New Zealand. In 2023 86% of all EU import came from this country. Import from China reached 14%.

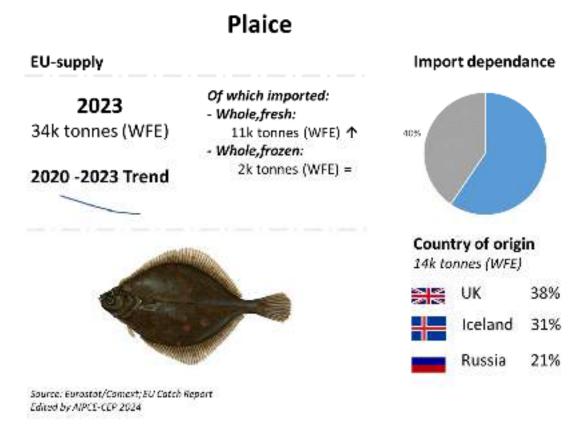


Figure 5.2.6.1: External sourcing countries for key wild captured hoki in 2023 in percentage (>1%) of total import (35 thousand tonnes); Source: Eurostat/Comext

There is an ATQ allowance available for hoki, under the form of frozen hoki fillets and meat for processing (09.2761) with a limit of 17,500 tonnes duty free import allowance.

Most hoki is imported via Poland, France or Germany. Frozen hoki fillets are responsible for almost all the import volume. Practically all hoki stays into the EU after import. The EU-NZ Free Trade Agreement will bring tariffs down to 0 in stages for whole hoki and filets from NZ easing the way into the EU..

5.2.9 Plaice



European plaice (*Pleuronectes platessa*) is an important species in European waters that has been exploited for centuries. Most of the European plaice is caught in the greater North Sea area (ICES area III^{ab}, IV^{abc}, VII^{de}).

European plaice processing finds place in especially Northern European countries with the village Urk (Netherlands) as flatfish hub. However, decreasing landing volumes put this industry under pressure. It is important to add other flatfish species to the industry to have a critical mass for processing and keeping the knowledge of flatfish processing alive.

The EU plaice supply shows a decreasing trend for many years. Despite a very high fishing quota for plaice the utilisation is low. EU catches decreased by 18 percent in 2023 compared to 2022, to 20 thousand tonnes. Compared to 2020, the EU production decreased by 59%.

EU policy does not help to improve the fishing quota utilization and secure domestic food production. The wish for an increased amount of Marine Protected Areas (MPA) and windmill parcs decrease fishing areas (and thereby the perspective) for the EU fishing fleet.

In the Netherlands the lack of perspective in EU fishing policy and increased production costs have realised that a around 50 flatfish cutters were decommissioned last year which explains the further reduction in domestic plaice production and fishing quota utilisation for 2023.

To fulfil the EU market demand for flatfish, like European plaice, solutions should be found to optimize the EU fishing quota utilisation on the one hand and to stimulate third country imports on the other hand. Lack of raw materials will make market perspectives worse.

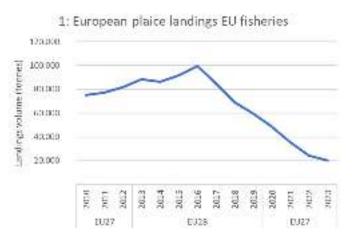


Figure 5.2.9.1: EU European plaice landings, year 2010-2023

The EU self-sufficiency for plaice is still high, but decreasing. In 2023 60% of all plaice came from EU fisheries (65% in 2022 and 72% in 2021). The import dependency increased compared with previous years. Beside decreased EU landings volumes the exit of the UK is another important reason for this. Plaice from UK flagged vessels landed into EU harbours are now seen as third country imports. Import volume increased slightly to 14 thousand tonnes in 2023 (13 thousand tonnes in 2022). UK is the main source of European Plaice imports to the EU, with 5.2 thousand tonnes in 2023 (38% of total), followed by Iceland (31% of total) and Russia (21% of total).

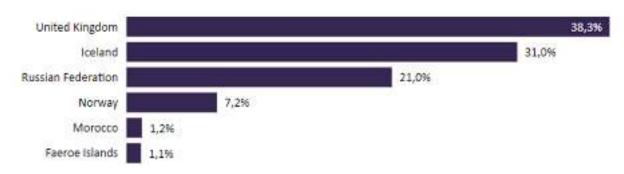


Figure 5.2.9.2: External sourcing countries for plaice in 2023 in percentage (>1%) of total import (14 thousand tonnes); Source: Eurostat/Comext

There are ATQ allowances for flatfish fillets (09.2778) and whole flatfish (09.2503) available for EU industry. The flatfish imported via these ATQs are not European plaice but additional or complementary flatfish species. The ATQ allowance for flatfish fillets was fully utilized in recent years (also after a quota lift up to 10,000 tonnes in 2020). Quota was already fully utilized far before the end of the year (November 2023).

The ATQ for whole frozen flatfish (7,500 tonnes) is not fully utilized yet, but utilisation is growing fast. It is a relatively new quota that have found the way to the processing industry, especially in Urk (Netherlands) to fill the loss of plaice processing. Quota use increased during the years and ended in 2023 with a quota use of 67 percent. This uptake will increase and this ATQ expected to be insufficient in the coming years if domestic production of European plaice stays low.

Fresh whole plaice are responsible for 83% of the European plaice imports, followed by frozen whole plaice (16%).

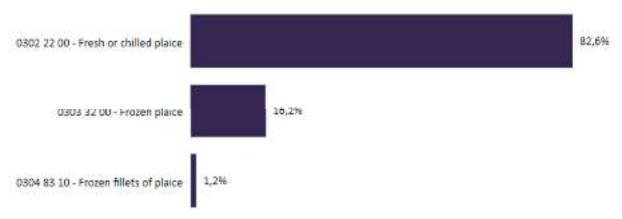


Figure 5.2.9.3: Main imported products of plaice in 2023 in percentage of total import (14 thousand tonnes); Source: Eurostat/Comext

To fulfil consumer demand and keep the flatfish market sustainable energy need to be put in getting the raw materials for EU industry. This should be done two sided. Effort should be made on optimizing the fishing quota utilisation for European plaice and third country imports should be stimulated. It is up to the Commission and industry to find the right way how to keep European place and flatfish as a healthy product in the EU seafood market and contribute to food security.

5.3 Other fish species

5.3.1 Salmon

Salmon (all species) **EU-supply** Import dependance Of which imported: 2023 Whole, fresh: 1,327k tonnes (WFE) 958k tonnes (WFE) 🗸 Fillet, frozen: 166k tonnes (WFE) ↓ 2020 -2023 Trend Fillet, fresh: 140k tonnes (WFE) 4 99% Country of origin 1,311k tonnes (WFE) Norway 5% 4% Faroer Source: Eurostat/Comext; EU Catch Report: FEAP Edited by AIPCE-CEP 2024

Salmon is the most consumed seafood specie in the EU. From all salmon species, Atlantic salmon is the most important one. The total EU salmon supply decreased to 1,327 thousand tonnes in 2023 (-5%; -65 thousand

tonnes). Since the UK – an important producer of Atlantic salmon - left the EU almost all salmon comes from outside the EU-27 (99%).



Figure 5.3.1.1: External sourcing countries for salmon in 2023 in percentage (>1%) of total import (1,376 thousand tonnes); Source: Eurostat/Comext

An increasing amount of salmon is imported as raw material for processing in the EU-27. Most of the raw materials come from EFTA Member states, like Norway, Faroe Islands and Iceland. Especially imports from Norway are of high importance, accounting for 80% of total salmon supply in 2023 (and 89% of the total whole fresh Atlantic salmon supply in 2023). Norwegian salmon creates more jobs in the EU than it does in Norway. The import of 1,054 tonnes of Norwegian salmon to the EU-27 generates thousands of direct jobs for the EU seafood processing industry.

Fresh whole salmon is responsible for 73% of the total salmon imports, followed by frozen salmon fillets (13%) and fresh salmon fillets (11%).

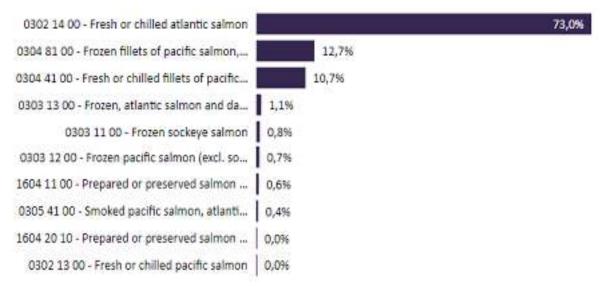


Figure 5.3.1.2: Main imported products of salmon in 2023 in percentage of total import (1,376 thousand tonnes); Source: Eurostat/Comext

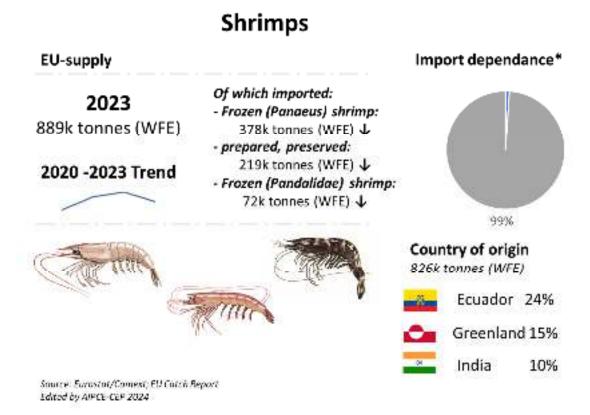
Salmon from Norway enters the EU-27 especially by road via Sweden, Denmark and Poland, where the fish are processed and/or further distributed throughout the EU-27. Processing in the EU-27 is an interesting option for Norway, considering labour cost in the EU is much lower, the import of unprocessed products will cost less import duty compared to processed products, and whole skin on salmon retains its quality better than processed products. Traditional EU wild caught processing plants are forced to diversify their processing assortment to stay solvent due to shortage of EU production. Salmon has become an essential processing species for these plants in especially Poland, Netherlands, Belgium, Denmark, France and Spain. Filleting and cold/warm smoking are the most important processing steps.

Norwegian farmed salmon is by Norwegian law sorted in three quality categories, 'superior', 'ordinary' and 'production'. Salmon are placed in the lowest category ('production') when they have wounds, deformities, processing errors or similar minor defects, and they are forbidden by Norwegian law to be exported before they are corrected for defects at Norwegian processing facilities. The correction is made only by fileting the fish, and the fillet can legally be exported out of Norway at cost-prices around 30 pct. below fillets from companies based in EU, who have access to the more expensive 'superior' or 'ordinary' from Norway. The cost-price of filets made from superior is 3-4 EURO higher than filets from production salmon. The EU salmon industry is simply outcompeted on EU and global markets. That's why the European Commission decided to recognize Norwegian export ban on production salmon as trade barrier. Norway has been confronted with this, aiming for the level playing field to be restored.

UK became an important new third country where salmon products were imported from into the EU-27. Materials are mainly originated from Scotland mariculture of Atlantic salmon. 85% of 59 thousand tonnes imported from UK consisted of whole, fresh salmon.

There is an ATQ allowance available for frozen wild caught pacific salmon H&G, and fillets (09.2822). The total quota volume is 10.000 tonnes. Utilisation increased in 2023 to around 55%.

5.3.2 Shrimp



*excluding EU non-quota species

The total EU shrimp supply accounted to 889 thousand tonnes in 2023. This is excluding the non-quota species like brown shrimp (*Crangon crangon*). From this supply, 826 thousand tonnes of shrimp were imported from third countries and 9 thousand tonnes came from shrimp fisheries under fishing quota management in the EU. This shows that the EU is heavily depending on imports for shrimp.

Most of the shrimp were imported from Ecuador (24%; farmed white shrimp *Penaeus vannamei*), Greenland (15%; wild Borealis shrimp), India (11%; farmed Pacific white shrimp & black tiger shrimp), Vietnam (10%; farmed Pacific white shrimp & black tiger shrimp), and Argentina (10%; wild Argentine red shrimp *Pleoticus muelleri*).

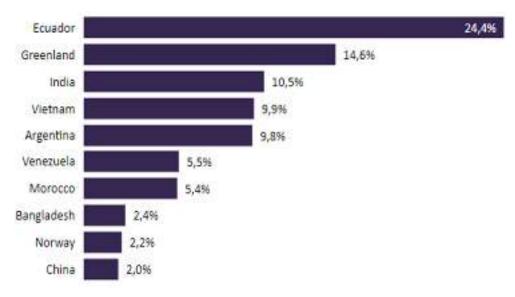


Figure 5.3.2.1: External sourcing countries for shrimp in 2022 in percentage (>2%) of total import (826 thousand tonnes); Source: Eurostat/Comext

Most of the shrimp producing third countries that export to the EU do benefit from GSP or from a free trade agreement (Ecuador, Vietnam and Canada) in force where shrimp are imported under reduced or zero import tariffs.

For cold water shrimp there are three ATQs available for the key *Pandalus* species *borealis*, *montagui* and *jordani* in 2021 (09.2794, 09.2798, 09.2800). Total allowance for these ATQs is 10,5 thousand tonnes.

Shrimps and prawns of the species *Pleoticus muelleri* have a separate ATQ (09.2826). The quota was increased to 16 thousand tonnes in the new ATQ regulation but already fully utilised at the end of May of the year and is still not sufficient to fulfil the demand of the EU processing industry. After the ATQ is exceeded the import duty is 12%. The high import duty and complexity on non-tariff measures will shift processing of the Argentinian *Pleoticus muelleri* shrimp to Asia.

Warm water prawns have a separate ATQ (09.2802) with a quota allowance of 48,000 tonnes. At the end of 2023 99% of the quota was utilised.

Frozen Penaeus shrimp was responsible for 46% of total import in 2023, followed by prepared and preserved (cooked) shrimp (15%).

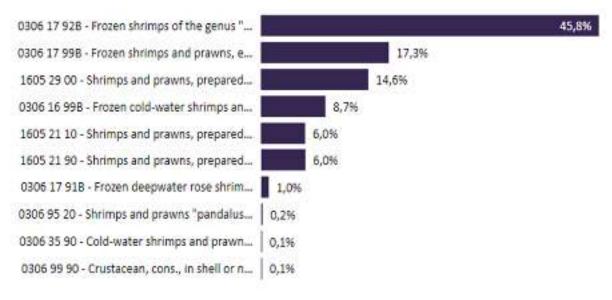


Figure 5.3.2.2: Main imported products of shrimp in 2023 in percentage of total import (826 thousand tonnes); Source: Eurostat/Comext

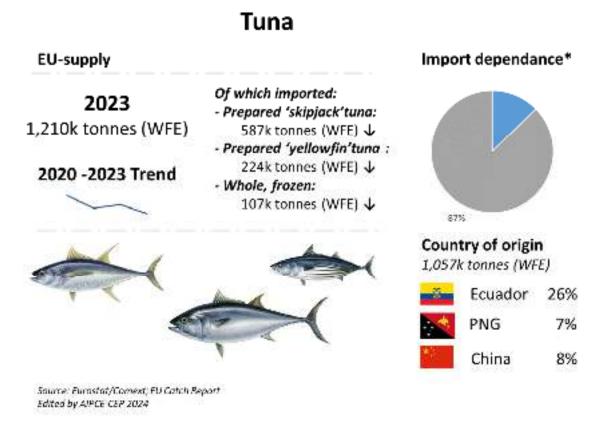
Shrimp products from India and Vietnam are exported into both Southern and Northern Europe as both prepared and as whole products. Shrimp from Ecuador are imported into especially the South of Europe as whole raw and unpeeled.

Argentine red shrimp are imported mainly by Spain and Italy for the Southern European market.

Borealis shrimp from Greenland and Canada are mainly imported via Denmark and (re-)exported into the rest of the EU.

A part of the EU fishing fleet targets brown shrimp (Crangon crangon). This species is not covered by fishing quota management under the CFP. Yearly around 30 thousand tonnes of brown shrimps are landed by mainly the Dutch and German fleet, but also the Danish and Belgian fleet. Because brown shrimp is a non-quota species it is not mentioned in the import dependence graph. This causes an underestimation of the self-sufficiency.

5.3.3 Tuna



*excluding EU non-quota species and aquaculture

Tuna is one of the top 3 species consumed in the EU. Skipjack tuna and yellowfin tuna are the most important tuna species in terms of volume. Other important species are bigeye tuna, albacore tuna and bluefin tuna.

Total supply of tuna products from accounted to 1,210 thousand tonnes in 2023 in WFE. From this total EU fisheries landed in total 127 thousand tonnes of quota tuna in 2023. Around 26 thousand tonnes of tuna was farmed in the EU in 2023. This results in a self-sufficiency of 13%. This self-sufficiency is an underestimation, where non-quota tuna fisheries is not included.

The EU tuna fishing fleet lands a significant higher amount tuna than the quoted volume mentioned earlier. Total tuna landings by EU vessels are over 500 thousand tonnes. However, the great majority is landed outside the EU. Spain is the number 1 producer, followed by France and Italy. Most of the tuna captured by the EU fishing fleet is landed and exported in ports near to the tropical fishing regions in Western Africa (Ivory Coast, Ghana) and Indian Ocean (Seychelles, Mauritius, Madagascar), where it is processed into tuna cans and then reexported to EU under preferential trade regimes inherited from the Cotonou agreement, namely the Economic partnership agreements with ESA (Eastern and Southern African) and Western Africa (ECOWAS).

Most important country for tuna in 2023 was Ecuador (26%), followed by China (8%) and Papua New Guinea (8%). Ecuadorian tuna benefit from a free trade agreement between EU and Ecuador.

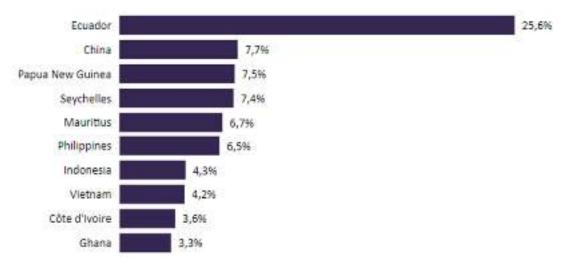


Figure 5.3.3.1: External sourcing countries for tuna in 2023 in percentage (>3%) of total import (1,057 thousand tonnes); Source: Eurostat/Comext

However, the supply of large pelagics such as tuna are governed by complex relationships between the EU and the locale of catch. EU flagged vessels operating under licence in many distant water fisheries which in itself provides substantial employment and fishing activity for EU vessels and processors, as well as employment in local developing counties.

With an average annual production of more than 370,000 tonnes, the EU canned tuna industry supplies only 46% of the EU market, with Spain, Italy, Portugal and France as main producers. It provides 20,140 direct jobs in the EU and 60,660 indirect jobs in the supporting sectors. This industry is mainly located in coastal areas highly dependent on fisheries and fish processing. As the recently EUMOFA report exposed, tuna loins have allowed the canning industry to maintain its competitiveness and its activity in the EU, which otherwise would have faced difficulties competing with factories located near the fishing areas. So it avoided the risk of a delocalization of production facilities outside EU.

There is an ATQ (09.2790) of 35 thousand tonnes for tuna loins for further processing that is exhausted very quickly – within days of opening – but in total actually represents only a small fraction of the total trade.

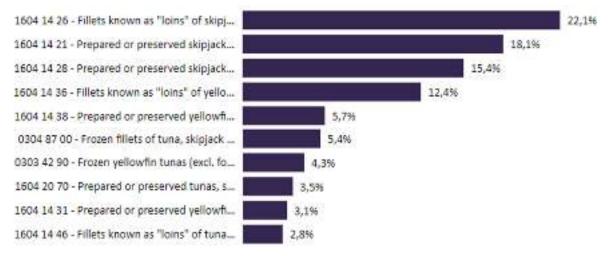


Figure 5.3.3.2: Main imported products of tuna in 2023 in percentage of total import (1,057 thousand tonnes); Source: Eurostat/Comext

Most tuna is imported in a prepared format (cans).

5.3.4 Mackerel

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EU-supply Import dependance Of which imported: 2023 Whole frozen: 340k tonnes (WFE) 118k tonnes (WFE) 个 - Frozen fillets: 31k tonnes (WFE) ↓ 2020 -2023 Trend Whole fresh: 22k tonnes (WFE) 1 Country of origin 181k tonnes (WFE) UK 29% Norway 17% Iceland 17% Source: Eurostat/Comext; EU Catch Report

Mackerel

Mackerel is one of the most important small pelagic commercial species in the world. The global annual catches of mackerel have totalled around one million tonnes in recent years, with the main catching nations being the EU, UK, the Faroe Islands, Greenland, Iceland, Norway and Russia.

Small pelagics such as mackerel are important species in the EU fishery complex and comprise the largest proportion of the tonnages taken in EU waters under quota species. The EU landed in total 159 thousand tonnes of Mackerel in 2022.

With a percentage of 47% self-sufficiency in the EU is high. The 181 thousand tonnes of mackerel that is imported into the EU comes from especially UK (29%; 52 thousand tonnes in 2023), Norway (17%; 31 thousand tonnes in 2023) and Faroe Islands (11%; 20 thousand tonnes in 2023).

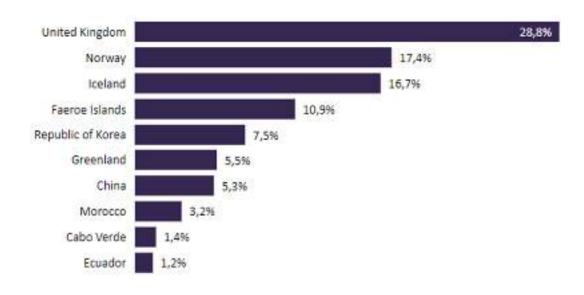


Figure 5.3.4.1: External sourcing countries for mackerel in 2023 in percentage (>1%) of total import (181 thousand tonnes); Source: Eurostat/Comext

Mackerel from the Northeast Atlantic Fisheries is of high importance for the EU seafood market. For years, the Coastal States have been unable to reach consensus on how to share the catch quotas. The TAC (739,386 tonnes; -5% on 2023 TAC) has been set according to the scientific advice from ICES. However, fishing quota are unilaterally increased bringing their total over the TAC. This is why Northeast Atlantic mackerel is not MSC certified in recent years. It is important to reach an agreement regarding fishing quota allocations to prevent having disruptive consequences that will affect the rest of the supply chain.

Almost all the supplying countries for mackerel are EFTA members States. However, there is an ATQ of 5 thousand tonnes (under 5% import tariff) available for chub mackerel (whole, fillets and flaps).

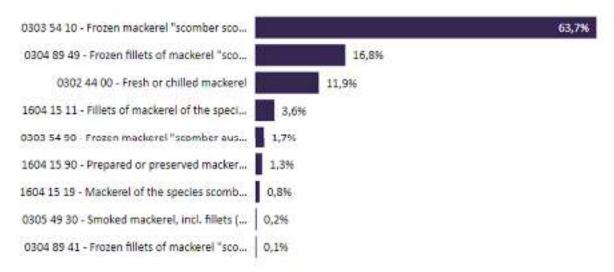
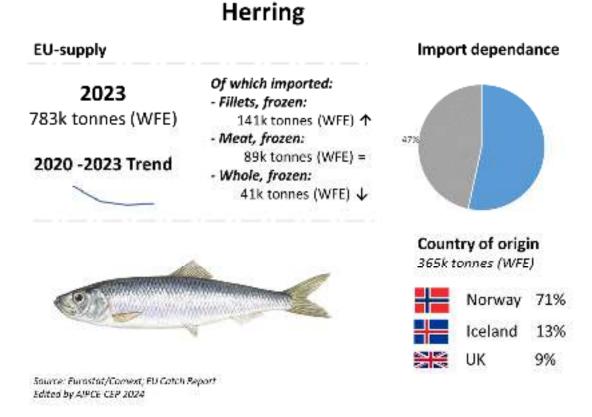


Figure 5.3.4.2: Main imported products of mackerel in 2023 in percentage of total import (181 thousand tonnes); Source: Eurostat/Comext

Frozen mackerel whole accounts for 64% of the mackerel imports, followed by frozen mackerel fillets (17%).

5.3.5 Herring



Small pelagics such as herring are important species in the EU fishery complex and comprise the largest proportion of the tonnages taken in EU waters under quota species. The total herring EU supply reached 783 thousand tonnes in 2023.

With a TAC of 613 thousand tonnes in 2023 herring is the largest individual species tonnage caught under EU management and in its waters. The EU self-sufficiency for herring is high with a percentage of 53% in 2023.

The North Sea Herring stocks are shared jointly between the EU, UK and Norway. For 2024 a TAC of 532,166 tonnes was recommended according to the scientific advice from ICES. For 2025 ICES has recommended a 22.5% cut in TAC.

Frozen herring fillets were responsible for 39% of the herring imports in 2023, followed by frozen meat (24%).

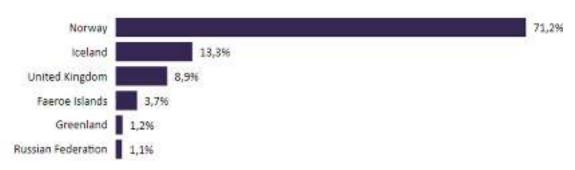


Figure 5.3.5.1: External sourcing countries for herring in 2023 in percentage (>1%) of total import (365 thousand tonnes); Source: Eurostat/Comext

Norway is the most important third country for herring imports (71%: 260 thousand tonnes in 2023), followed by Iceland (14%; 49 thousand tonnes) and UK (9%; 33 thousand tonnes).

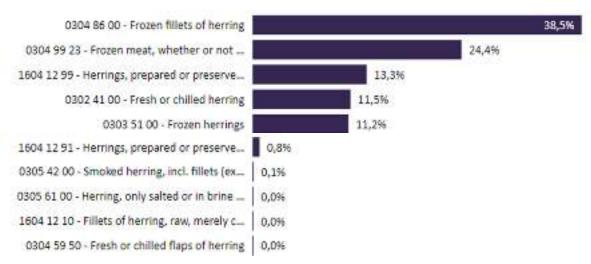


Figure 5.3.5.2: Main imported products of herring in 2023 in percentage of total import (365 thousand tonnes); Source: Eurostat/Comext

Raw materials for 'Maatjes haring' come from Norwegian and Danish vessels. Frozen and salted semi-finished products are imported and processed to famous herring delicatesses.

Frozen herring from a significant share of the EU fleet are exported to especially African countries, where they are sold per piece. In this way healthy nutrients are provided to countries with less purchasing power.

Anchovies

5.3.6 Anchovies

EU-supply Import dependance 15% Of which imported: 2023 - Salted: 49k tonnes (WFE) 6k tonnes (WFE) 个 Whole frozen: 1k tonnes (WFE) = 2020 -2023 Trend Country of origin 7k tonnes (WFE) Argentina 43% Morocco 34% Bosnia 8% Source: Eurostat/Comext; EU Catch Report Edited by AIPCE-CEP 2024

In 2023 Anchovies EU supply increased to 49 thousand tonnes, +6 thousand tonnes compared to the year before (+17%). With a percentage of 85% self-sufficiency in the EU is high. The 7 thousand tonnes of anchovies that is imported into the EU comes from especially Argentina (43%; 3 thousand tonnes in 2023), Morocco (34%; 3 thousand tonnes in 2023) and Bosnia (8%; <1 thousand tonnes in 2023).

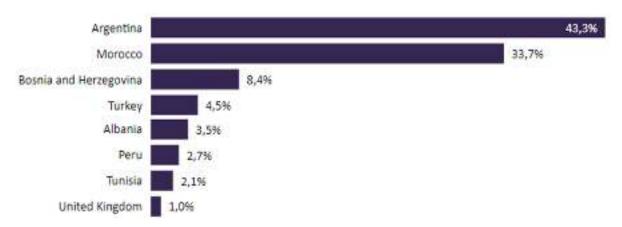


Figure 5.3.6.1: External sourcing countries for anchovies in 2023 in percentage (>1%) of total import (7 thousand tonnes); Source: Eurostat/Comext

There is an ATQ allowance available for anchovies. Anchovies salted or in brine (09.2770) has a limit of 1,500 tonnes duty free import allowance.

Salted anchovies were responsible for 82% of the anchovies imports in 2023, followed by whole frozen anchovies (17%).

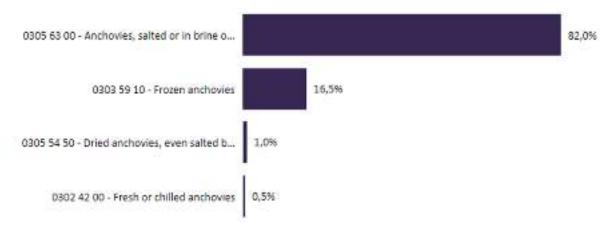


Figure 5.3.6.2: Main imported products of anchovies in 2023 in percentage of total import (7 thousand tonnes); Source: Eurostat/Comext

Most anchovies are processed to especially semi-preserved product in Spain, France and Italy.

5.3.7 Sardines

EU-supply 2023 105k tonnes (WFE) Of which imported: - Whole frozen: 43k tonnes (WFE) Country of origin 43k tonnes (WFE) Morocco 88% UK 11% Mauritania 1%

Sardines

In 2023 Sardines EU import decreased to 43 thousand tonnes WFE, -7 thousand tonnes compared to the year before -14%), mainly coming from Morocco (88%; 38 thousand tonnes in 2023), UK (11%; 5 thousand tonnes in 2023) and Mauritania (1%; <1 thousand tonnes in 2023).



Figure 5.3.7.1: External sourcing countries for sardines in 2023 in percentage (>1%) of total import (43 thousand tonnes); Source: Eurostat/Comext

The EU fisheries are catching sardines but this specie is not fully covered by fishing quota management under the CFP. Over 150 thousand tonnes of sardines are caught by the Croatian, French, Portuguese, Italian, Spanish and Dutch fleets. Taking this number into account the self-sufficiency for sardines is high for the EU.

There is no ATQ allowance available for sardines.

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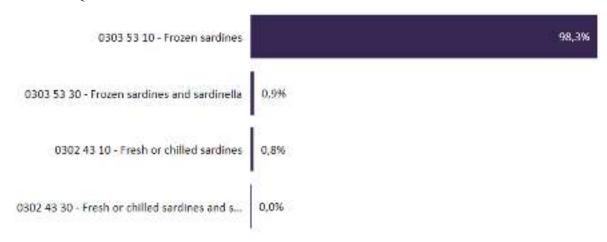
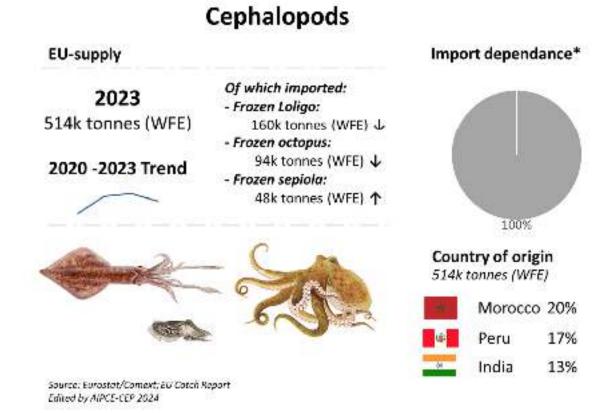


Figure 5.3.7.2: Main imported products of sardines in 2023 in percentage of total import (43 thousand tonnes); Source: Eurostat/Comext

Whole frozen sardines were responsible for 99% of the sardine imports in 2023.

5.3.8 Cephalopods



*excluding non-quota EU fisheries

The main products that fall under cephalopods category are squid (*Loligo spp, Ilex* spp, *Nototodarus* spp, *Todadores* spp, *Dosidicus spp*), cuttlefish (*Sepia spp*), and Octopus (*Octopus spp*). The total cephalopods EU supply in 2023 was 514 thousand tonnes, of which 505 thousand tonnes was frozen.

EU sourcing countries for cephalopods vary depending on the species supplied. For the main species the most important sourcing countries are mentioned below.

Frozen squid (Loligo spp.)

Frozen *Loligo* squid represented 31% of the total cephalopod supply in 2023, around 160 thousand tonnes (-11%; -20 thousand tonnes). An important share of the frozen *Loligo* squid comes from the Falklands (UK), India and Morocco.

Frozen Octopus (Octopus spp.)

Frozen Octopus represented 18% of the total cephalopod supply in 2023, around 94 thousand tonnes (-7%; -8 thousand tonnes). An important share of the frozen octopus comes from Morocco, Mauritania and Indonesia.

Frozen flying squid (Ilex spp.)

Frozen flying squid represented 9% of the total cephalopod supply in 2023, around 47 thousand tonnes (+37%; +13 thousand tonnes). An important share of the frozen ilex spp. comes from China and Argentina.

Cephalopods caught in the EU do not fall under a quota system (and thereby not included in the info-graphic above). However, there is a significant fishery on cephalopods in the EU (squid, cuttlefish and octopus), catching around 200 thousand tonnes of cephalopods yearly.

Although there are European catches, these catches are not sufficient to supply the processing industry in Europe. Availability of raw material for the industry is highly dependent on imports, specially, when talking about *Loligo spp.*, *Ilex ssp.*, *Nototodarus spp.*, *Todadores ssp.* and *Sepia spp.* and even fully dependent for *Dosidicus spp.*

Once the UK is not part of the EU anymore, raw material from UK overseas territories like Falklands are now suffering import duty. Despite the request of the UK Government, the EU declined to allow the overseas territories to be covered by the UK-EU Trade and Cooperation Agreement (TCA).

Council Regulation (EU) 2020/1706 is the regulation to open and provide the management of autonomous tariff quotas for certain fishery products for period 2021-2023. Main processing for *cephalopods* is to comply with very restrictive conditions to meet this regulation, therefore, most of the *cephalopods* from UK overseas territories are now sent to China and USA. This has a negative impact on the EU processing industry which loses competitiveness in global market. A less restrictive treatment should be allowed as adequate by the European market and in the ATQ Round of 2024-2026 splitting of blocks was added as a qualifying operation.

Most of the cephalopods are consumed and processed in the Southern European countries. These countries are familiarized with cephalopods.

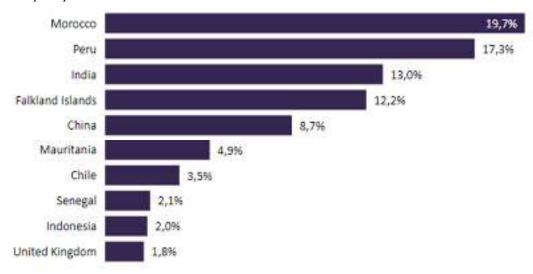


Figure 5.3.8.1: External sourcing countries for cephalopods in 2023 in percentage (>1%) of total import (514 thousand tonnes); Source: Eurostat/Comext

The main procurement countries in 2023 for the EU were Morocco (20%), Peru (17%) and India (13%).

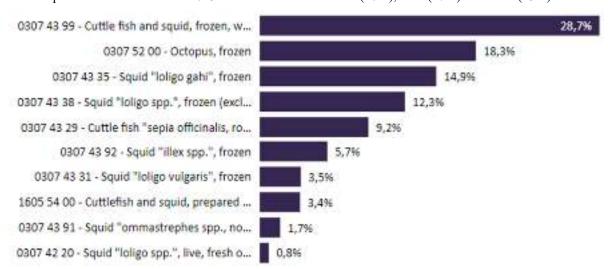
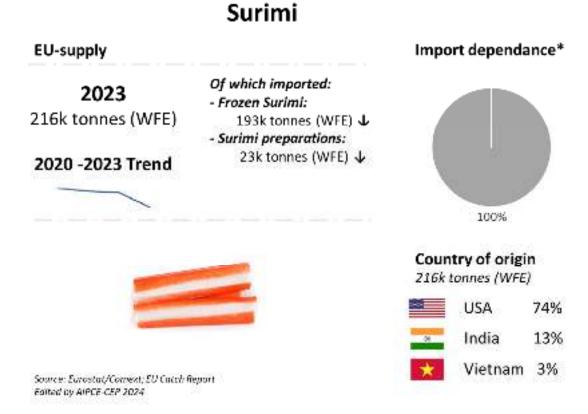


Figure 5.3.8.2: Main imported products of cephalopods in 2023 in percentage of total import (514 thousand tonnes); Source: Eurostat/Comext

5.3.9 Surimi



*excluding EU fisheries for surimi

Surimi refers to a paste made from fish. Frozen surimi is a concentrate of whitefish. Main species used are Alaska pollock, blue whiting, blue grenadier and Pacific hake.

Surimi base (or frozen surimi in blocks) is sold to food processors, which transform the material with other ingredients to give it texture, taste and colour. Most common surimi seafood in the EU is crabstick imitation, but other develop such as baby-eel imitations, or calamar rings imitations, all ready to eat.

The import volume of surimi (both frozen surimi paste, and surimi seafood) was 216 thousand tonnes WFE in 2023 (-10%; -24 thousand tonnes). The most important country for surimi in 2022 was USA (74%), followed by India (13%) and Thailand (3%).

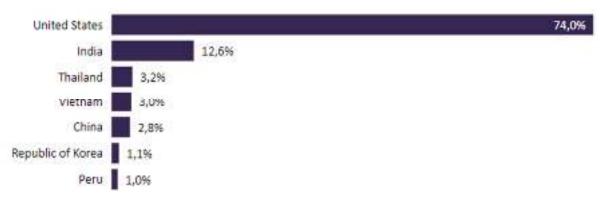


Figure 5.3.9.1: External sourcing countries for surimi in 2023 in percentage (>1%) of total import (216 thousand tonnes); Source: Eurostat/Comext

EU has a single fishery realizing surimi paste from blue whiting, under statistical secret. The main surimi processors in the EU are France, Spain and Lithuania. Frozen surimi of Alaska Pollock was responsible for 44% of the surimi imports. 89% of all surimi imports was frozen surimi. The other 11% of imports in 2023 consisted of frozen surimi presentation -in other words finished products-.

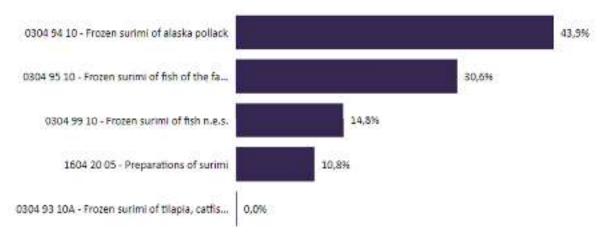
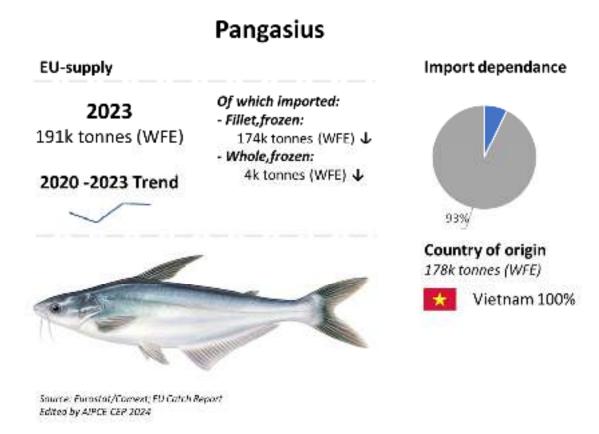


Figure 5.3.9.2: Main imported products of surimi in 2023 in percentage of total import (216 thousand tonnes); Source: Eurostat/Comext

There is an ATQ allowance available for surimi as a raw material for further processing (09.2772). Around 78% of total agreed quantity (60 thousand tonnes) was utilised in 2023.

5.3.10 Pangasius



Pangasius is one of the key cultivated finfish species across the globe. The EU market actually represents only a tiny percentage of the consumption. Pangasius has been growing in EU in recent years but slightly decreased in 2023 to 191 thousand tonnes (-2%; -3 thousand tonnes).

There is EU production of pangasius, around 13 thousand tonnes. EU import dependency is 93%.

Vietnam 99,2%

Figure 5.3.10.1: External sourcing countries for pangasius in 2023 in percentage (>1%) of total import (178 thousand tonnes); Source: Eurostat/Comext

Pangasius is an aquaculture product, mainly produced in Vietnam. >99% of the import volume in 2023 came from this third country (178 thousand tonnes). Almost all pangasius was imported as frozen fillets (98%).

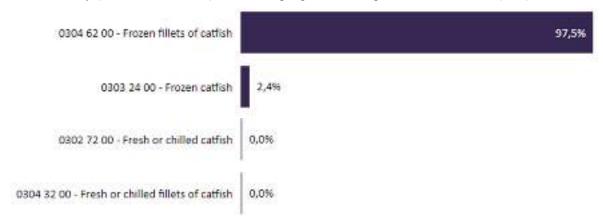
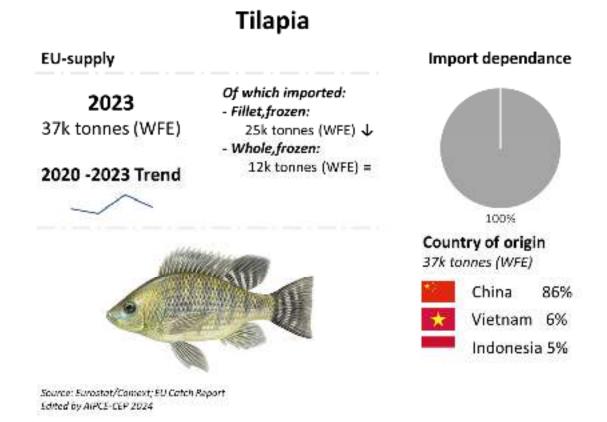


Figure 5.3.10.2: Main imported products of pangasius in 2023 in percentage of total import (178 thousand tonnes); Source: Eurostat/Comext

5.3.11 Tilapia



Tilapia is one of the key cultivated finfish species across the globe second in scale only to Chinese carp. The EU market actually represents only a tiny percentage of the consumption. Tilapia has a global supply of several million tonnes yet the EU, by AIPCE-CEP estimates, consumes only around 37 thousand tonnes or about 1-2% of global supply in 2023.

There is practically no EU production for tilapia. EU self-sufficiency is negligible.



Figure 5.3.11.1: External sourcing countries for tilapia in 2023 in percentage (>1%) of total import (37 thousand tonnes); Source: Eurostat/Comext

Tilapia is an aquaculture product with production in several regions of the world. 86% of the EU import volume in 2023 came from China (32 thousand tonnes). Other important countries were Vietnam (6%) and Indonesia (5%).

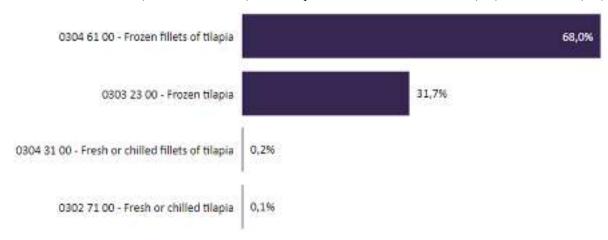
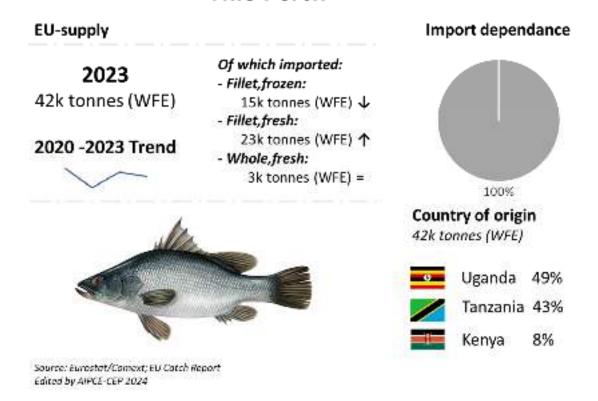


Figure 5.3.11.2: Main imported products of tilapia in 2023 in percentage of total import (37 thousand tonnes); Source: Eurostat/Comext

Most of the tilapia was imported as frozen fillets (68%), followed by frozen whole tilapia (32%). An ATQ for tilapia filets of 10 000 tons was introduced in the 2024-2026 round.

5.3.12 Nile perch

Nile Perch



Nile perch is the most important freshwater product imported from Eastern Africa, were it is captured in Lake Victoria. All Nile perch comes from Uganda, Tanzania or Kenya, all 3 coastal countries to the Lake Victoria. The EU imported 42 thousand tonnes of Nile perch in 2023, -5% compared to 2022.

There is no EU production for Nile perch. EU self-sufficiency is 0%.



Figure 5.3.12.1: External sourcing countries for Nile perch in 2023 in percentage (>1%) of total import (42 thousand tonnes); Source: Eurostat/Comext

Most important countries for Nile perch in 2023 were Uganda (49%; 21 thousand tonnes), followed by Tanzania (43%; 21 thousand tonnes) and Kenya (8%; 3 thousand tonnes).

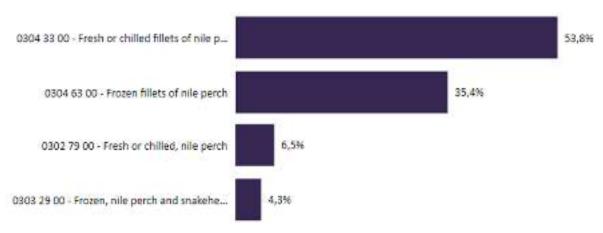


Figure 5.3.12.2: Main imported products of Nile perch in 2023 in percentage of total import (42 thousand tonnes); Source: Eurostat/Comext

Most of the Nile perch was imported as fresh fillets (54%) or frozen fillets (35%). The fresh fillets are imported into the EU using the super-chilling technique - a technique that reduces the temperature of fish uniformly to a point slightly below that which is obtained in melting ice -.

Import dependance* **EU-supply** Of which imported: 21% 2023 Whole, fresh: 128k tonnes (WFE) 26k tonnes (WFE) 个 Whole, frozen: 1k tonnes (WFE) = 2020 -2023 Trend Country of origin 27k tonnes (WFE) Turkey 98% UK 1% Source: Eurostat/Comext; EU Catch Report; FEAP Edited by AIPCE-CEP 2024

Sea bass

*excluding EU fisheries for seabass

Together Sea bass and Sea bream are two of the most successful species cultivated in the EU. Fish are farmed in sea cages or raceways. There is a very small amount of wild capture of Sea bass.

EU cultivated sea bass reached the volume of 101 thousand tonnes in 2023. EU self-sufficiency reached 79%.

The main EU producers of sea bass are Greece, Spain, Italy and France.



Figure 5.3.13.1: External sourcing countries for sea bass in 2023 in percentage (>1%) of total import (27 thousand tonnes); Source: Eurostat/Comext

The most important sourcing third country for sea bass in 2023 was Turkey. 98% of all import came from this country.

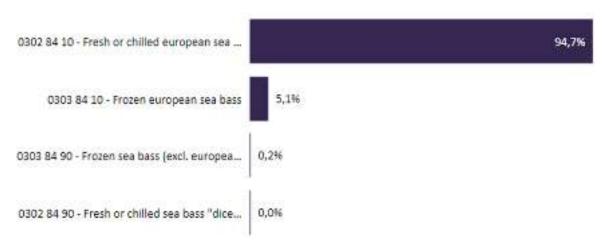
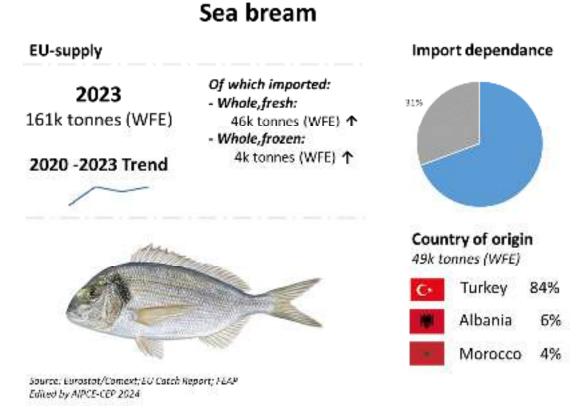


Figure 5.3.13.2: Main imported products of sea bass in 2023 in percentage of total import (27 thousand tonnes); Source: Eurostat/Comext

Most of the sea bass was imported as fresh whole European sea bass (95%).

5.3.14 Sea bream



Together Sea bass and Sea bream are two of the most successful species cultivated in the EU. Fish are farmed in sea cages or raceways.

There is a small level of wild capture in Sea bream in the EU. However, most of 112 thousand tonnes EU production (99%) came from aquaculture. Self-sufficiency was 69%.

Sea bream are consumed as whole fish and can be marketed in different sizes (typically around 400-600 grams). The main EU producers are Greece, Spain and Italy.



Figure 5.3.14.1: External sourcing countries for sea bream in 2023 in percentage (>1%) of total import (49 thousand tonnes); Source: Eurostat/Comext

Import volume increased to 49 thousand tonnes in 2023. Most important sourcing third country for sea bream in 2023 was Turkey (84%), followed by Albania (6%) and Morocco (4%).

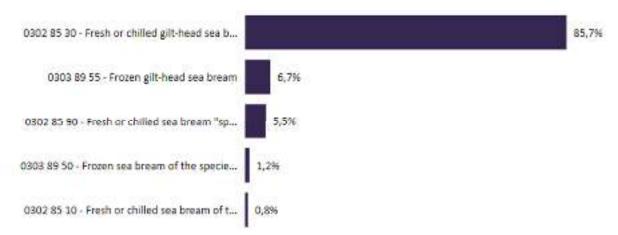


Figure 5.3.14.2: Main imported products of sea bream in 2023 in percentage of total import (49 thousand tonnes); Source: Eurostat/Comext

Most of the sea bream was imported as fresh whole 'Sparus aurata' (86%).

6 In Conclusion

This AIPCE-CEP study is compiled for the benefit and use of AIPCE-CEP members and to help others understand the activities of the organisation AIPCE-CEP. AIPCE-CEP is not liable for any errors in the accuracy of the data or in its representation.

The study has been published since 1992 and provides insight into the changes that have occurred to the seafood market during that time. AIPCE-CEP remains confident that the fish and seafood market across the EU can support a successful and vibrant industry. Imports remain the more prominent part of supply but the opportunity for EU fisheries is substantial. AIPCE-CEP members will continue to work on developing the use of resources from around the globe that are safe, sustainable and properly regulated.

AIPCE-CEP would welcome comments and suggestions about additional topics the reader wishes to see covered in further detail (aipce@kellencompany.com). There are also further publications and commentaries at our website: www.aipce-cep.org.